

EXHIBIT I



RE: Discovery Responses for Troy Curran

1 message

Nathan White <NWhite@fallslawfirm.com>
To: Michelle Gessner <michelle@mgessnerlaw.com>

Thu, Dec 5, 2024 at 3:27 PM

Michelle,

I'm working on getting responses from the other two natural persons you served and submitting documents.

There's a procedural reason why we have not filed a superseadas writ or bond at this point. The time for appeal is not yet ripe, nor are any collection efforts.

It is an absolute miscarriage of justice that you brought Brandy and Amber into this case and a further travesty that the Court found them jointly and severally liable. Their names weren't even mentioned in the second phase of the trial and no evidence was shown of any transfers of any assets of the employer defendants to either of these individuals. Their only tangential connection to this case is they happen to be Troy's daughters and you know it. Justice will prevail on appeal. I would highly caution you against attempting to collect against either Brandy or Amber and I would further bring it to you attention that Brandy is in the maritime service and any attempt to garnish her wages is precluded by 46 USC 11109. <https://www.law.cornell.edu/uscode/text/46/11109>

Every penny you attempt to collect will be clawed back when we prevail on appeal. I would again caution you on attempting any collection efforts at this time.

I will also caution you and remind you that a valid judicial proceeding occurred in the State of Washington that you and your clients were on notice of and that you chose to ignore and not contest. The WDNC judgment completely ignores the fact that this was a valid proceeding and all of your clients were employees of Computer Haus NC, Inc. and not Ocean Tech, Inc. So, in addition to cautioning you about attempting to collect against my client's daughters who had nothing to do with anything, I would caution you against any attempts to collect against Ocean Tech, Inc., which likewise should've been dismissed from this lawsuit as well. Once again, when we prevail on appeal, we will claw back any assets that you attempt to seize from Ocean Tech as well. Going after Ocean Tech is effectively ignoring the Receivership Order and I caution you or your local WA counsel to tread carefully in that regard as well.

I will get you responses and documents. Feel free to file your motion to compel if you feel compelled to do so. I am working to get you documents. I would also note that you have a substantial amount of information already from pretrial discovery. I am working up supplementing that for time periods after the close of pretrial discovery.

R, Nate



Nathan A. White | Partner

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From: Michelle Gessner <michelle@mgessnerlaw.com>
Sent: Thursday, December 5, 2024 11:26 AM
To: Nathan White <NWhite@fallslawfirm.com>
Subject: Re: Discovery Responses for Troy Curran

Nate - As you are aware, discovery requests were served on September 3, 2024. As of today, two weeks after your email below, no documents have been received and only incomplete responses for Troy Curran. Defendants' responses are grossly overdue and incomplete. Indeed, Troy Curran's written responses must be supplemented because they provide the bare minimum of information and cannot rely on stale information previously produced or provided years ago. Plaintiffs are left with no choice but to proceed with a Motion to Compel unless fulsome and complete responses to all discovery requests, including supplemental responses, are **received by 5pm tomorrow at my office.**

Yes, we intend to collect the jury's verdict and Court's judgment against all Defendants. If Defendants are so sure they win on appeal, then they need to secure a supersedeas bond for the entire amount immediately. That is the ONLY way we will cease our collection efforts. Further, as a reminder, the Court expressly warned your clients about further transferring assets, which are aware Mr. Curran has done so despite the court's admonishment regarding the same. Yet, no efforts have been made to seek permission or pay the verdict with the proceeds. We intend to proceed with all avenues available for collection and bring the continued moving of assets to the Court's attention.

Please confirm fulsome discovery responses will be delivered to my office by tomorrow.

L. Michelle Gessner
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Michelle,

Please find attached our responses to the discovery requests for Troy. I am working on putting together bank account statements, tax returns, etc. responsive to the requests that supplement pretrial discovery.

I am working on Brandy and Amber's responses. Given that these individuals had absolutely no business being in this lawsuit and it is frankly disgusting that they were not dismissed from this suit by the Court at any point, and there's zero chance that the 4th Circuit won't dismiss them from this lawsuit on appeal, do you honestly intend to go after these two individuals for any of their assets?

R, Nate



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